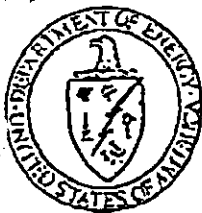


0075966



Department of Energy
Richland Operations Office
P.O. Box 550, MSIN HD-12
Richland, Washington, 99352-0550

FAX COVER SHEET

Date:

9/2/97

RECEIVED

FEB 06 2008

EDMC

Page 1 of 6 Pages (Coversheet included)

To Fax Number: (509) 891-6748	From Fax Number: ____ (509) 376-4360 (RP/AME) ____ (509) 373-0726 (RPS) ____ (509) 376-7818 (Copy Room)
Name: TONI DAWSON	Name: JAMIE ASLOFT
Office Number/Physical Location: ()	Office Number/Physical Location: () 3350 George Washington Way Richland, Washington
Organization:	Organization: ____ Restoration Projects (RP) ____ Restoration Projects Support (RPS) ____ Assistant Manager for ____ Environmental Restoration (AME)

Message

1100 PAS COMMENTS! THE "OFFICIAL" COPY IS GOING

THRU THE SIGNATURE CHAIN & WILL BE FAXED /

MAILED SOON.

Mr. Philip Laumeyer
United States Department of Interior
Fish and Wildlife Service
Upper Columbia River Basin Field Office
11103 E. Montgomery Drive, Suite #2
Spokane, WA 99206

RECEIVED

SEP 12 1997
U.S. Fish & Wildlife Service
Ecological Services
Spokane, WA

Dear Mr. Laumeyer:

Attached are additional United States Department of Energy (DOE) comments to the document titled "Hanford 1100 Area Preassessment Screen, Draft 1" prepared by your office. These are the additional comments that we referenced in our September 11, 1997 letter to you concerning this document. For the sake of efficiency, the attached comments have been reviewed to prevent the duplication of or conflict with other DOE comments. There will be no additional DOE comments to Draft 1. If you have any questions or concerns, please call Mr. James Zeisloft at (509) 372-0188.

Sincerely,

James E. Rasmussen

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 3
To Toni Davidson	From J. Lewinsohn	
Co.	Co.	
Dept.	Phone # 509-373-9628	
Fax # 509-891-6748	Fax # 509-376-7818	

United States Department of Energy, Richland Operations Office (RL)
Additional Comments to the
Hanford 1100 Area Preassessment Screen (PAS) Draft 1

General Comments

1. Following a format of answering the five criteria seems a more effective way of addressing the PAS requirement. All past activities need to be described in the past tense.

Section II

2. Page 4, Section 2, 8th line - No explanation is made as to why the previous PAS was found to be deficient. Why was another PAS prepared?

Section III

3. Page 9, 11th line - This sentence needs to be clarified. The documents reviewed did address potential natural resource injury, in particular to geologic, surface water and groundwater resources. Was the intent of the sentence is to indicate that injury to biological resources was not thoroughly investigated?

4. Page 13, 2nd line - Revise the sentence "The potential for contaminant migration was not rigorously investigated at any of the sites in the EM-2 OU." Subsequent pages seem to detail considerable site investigation at the EM-2 OU that would bear on the issue of contaminant migration. This also applies to the same statement made on page 15 regarding EM-3.

5. Page 14, 13th line - There are no current activities at the OU. This area has been excessed (i.e. transferred from DOE ownership). Remove the sentence on current activities.

6. Page 15, next to last sentence - Remove this sentence. Although the source appears to be a DOE document, the statement is biased and misleading.

7. Page 16, 4th line - Change "natural research area" to "Research Natural Area" and "to preserve shrub-steppe" to "to allow research in shrub-steppe".

8. Page 24, 5th line - The report of numerous drums was anecdotal and unsupported. It was investigated and found to be untrue.

9. Page 43, Section III.B.4.p., last sentence - Unlike previous pages, the phrase "no remedial action was taken" is used in lieu of "needed". This implies that perhaps remedial action should have been taken but wasn't. Can the word "taken" be replaced with "needed" or "required"? This comment is applicable to all section with similar wording.

10. Page 53, section C - This section needs to be more accurately titled. (e.g. contaminants detected, contaminants of concern).

11. Page 56, section D - Seimens is the most probable source of TCE and radionuclides in the groundwater under Horn Rapids Landfill. They should be

listed as a PRP.

Section IV

12. Page 58, last sentence - This sentence implies that there are damages that are not excluded. Reword to read "Upon review of available information, it was determined that

Section V

13. Sections D.2, D.3, and D.5 need to more clearly identify sites where injury has or may occur and prioritize those injuries. Sites where no injury has occurred or is likely to occur also need to be more clearly identified.

14. Page 67, 2nd sentence - The statement that the exposure could not be assessed due to the lack of data is incorrect. Refer to Section III.B.b on page 20.

15. Page 69, Section V.D.2., 1st sentence - Justification and supporting information/analysis for this sentence are needed. The other sentences in this section do not appear to relate to the first sentence.

16. Page 69, Section V.D.2., 3rd line - Clarification/elaboration is needed for this sentence. What are the contaminant and cleanup levels? Are contaminants being treated via natural attenuation or any other method? Is migration a problem? This statement is not consistent with the ROD.

17. Page 69, Section V.D.3, 1st sentence - Trusteeship of natural resources within the 1100 Area has not been clearly defined and not all trustees have trusteeship over 100 Area resources. Reword to read "Designated trustees (e.g. the U.S. Department of Interior, ...) have trusteeship over ..."

18. Page 71, Section V.D.5, 1st sentence - This sentence is speculative in nature. See first comment for Section 5. above.

RECEIVED

SEP 02 1997

U.S. Fish & Wildlife Service
Ecological Services
Spokane, WA

Mr. Philip Laumeyer
United States Department of Interior
Fish and Wildlife Service
Upper Columbia River Basin Field Office
11103 E. Montgomery Drive, Suite #2
Spokane, WA 99206

Dear Mr. Laumeyer:

The United States Department of Energy (DOE), Richland Operations Office (RL) has completed it's review of the document titled "Hanford 1100 Area Preassessment Screen, Draft 1" prepared by your office. Our comments to that document are attached. Please note that additional comments are forthcoming from RL's and DOE Headquarter's Office of Chief Council. Those additional comments will be forwarded under separate cover as soon as they are available.

As agreed to during the August 14, 1997 Natural Resource Trustee Council, the interagency agreement between RL and your office will be revised to extend the preparation period for Draft 2 of the preassessment screen. With that revision, the Draft 2 report will be due October 2, 1997. In the meantime, if you have any questions, please call Mr. James Zeisloft at (509) 372-0188.

Sincerely,

James E. Rasmussen

cc: D.D. Teel (BHI)

bcc: J.H. Zeisloft (EAP)
J.B. Hall (EAP)
S.N. Balone (RPS)
R.A. Holten (RPD)
P.W. Willison (OCC)

Record Note: RL has signed an interagency agreement with the U.S. Fish & Wildlife Service (USFWS) for the preparation of a natural resource damage assessment preassessment screen (PAS) for the former Hanford 1100 Area. The PAS is being prepared as required by and in accordance with the applicable natural resource damage assessment regulations (40 CFR, Subpart G and 43 CFR Part 11). RL's comments to the first draft of the PAS are being transmitted to USFWS via this letter.

Concurrence: S.N. Balone (RPS), R.A. Holten (RPD), P.W. Willison (OCC)

United States Department of Energy, Richland Operations Office (RL)
Comments to the
Hanford 1100 Area Preassessment Screen (PAS) Draft 1

General Comments

ok 1. Throughout the document, operable units are referred to using different terms (e.g. operable unit 1100-EM-1, OU EM-1, the 1100-EM-1, the EM-1). Also throughout the document, operable unit sites are referred to as subunits, units, sites or areas. Only one term should be used to describe operable units and sites.

Section II

ok 2. Page 4, 10th line - Rewrite to read " 2) The Hanford Arid Lands Ecology Reserve (ALE) PAS".

Section III

ok 3. Page 5, III.A.1, 2nd para, last sentence - Some sites are eligible for listing or have been listed in the National Register.

ok 4. Page 6, last para, 2nd line - Reword to read "(Ecology), entered into a Federal Facility Agreement and Consent Order (commonly referred to as the Tri-Party Agreement or TPA) in May 1989. The TPA established ..."

ok 5. Page 9, 2nd para, 6th line - What is "in sited-affected media" ?

ok 6. Page 9, 2nd para, last sentence - Reword to read "No documents reviewed as part of this PAS investigated or discussed ...".

? 7. Page 10, 2nd para, 1st sentence - EM-1 was the only OU where a full baseline risk assessment was performed. However, a qualitative risk assessment was performed for the other OUs.

3 ok 8. Page 10, 2nd para, last line - Define BRSRA and BISRA.

? 9. Page 10, 3rd para - Provide more detail on the ecological risk assessment sensitive habitats and terrestrial organisms.

ok 10. Page 11, last para, 2nd line - Only nine, not ten, sites are listed.

? 11. Page 11, last sentence - Additional information on the outcome of the Hanford Patrol Academy needs to be added. Please contact RL.

ok 12. Page 12, 1st para, next to last sentence - RL shut down the Hanford Site bus transportation system in 1996.

ok 13. Page 12, 2nd para, 1st sentence - Replace "preremedial" with "remedial". Make this change throughout the document.

ok 14. Page 13, 1st line - Reword to read "investigations of waste management sites ...".

ok 15. Page 16, 1st sentence - Reword to read "The IU-1 OU is located within the area known as ...".

ok 16. Pages 16 & 17 - The description of 1100 IU-1 is confusing. The narrative should refer to the areas listed in Figure 4 (i.e. the Nike Missile Control Center and the Nike Missile Launch Site) and then describe the sites within those areas. Also, note that the ALE laboratory facilities were abandoned in 1995.

ok 17. Page 19, 1st and 2nd para - The 1st para states that the pit is unlined. The 2nd para refers to the sand-lining. The sand-lining should be referred to as sand-fill.

ok 18. Page 24, last two lines - The term "parts per billion by volume (ppbv)" should be used for the soil gas data pertaining to the paint and solvent pit.

ok 19. Page 26, 1st para, next to last sentence - Does this sentence refer to the MCL for TCE? If so, it conflicts with Table 3, which shows TCE at a maximum concentration of 3 ppb, which is below the TCE MCL of 5 ppb.

need to Δ. 20. ~~Page 28, Section III.B.2.~~ - Reword to read "The following sites were identified for further remediation during the LFI/FFS.". Do the same for Section III.B.3 on page 29.

ok 21. Page 28, Section III.B.2. ~~a~~ - In III.C, the 700 Area-Waste Solvent Tank and the 1100 Area Bus Shop are listed along with their contaminants. Nothing was mentioned about these two areas in III.B.2 under the 1100-EM-2 Sites. If these sites are listed in Table III.C, they should be mentioned in the text.

ok 22. Page 32, 1st sentence on the page - Only 30, not 32, sites are detailed. Please explain.

ok 23. Page 32, Section III.B.4.a - These two sentences seem contradictory: "Results for VOCs are listed in Table 1-1 in DOE 1994c. No VOCs were detected in the soil samples; therefore,..." The first sentence can be deleted if no VOCs were detected. The same could be applied to other similar descriptions.

ok 24. Page 35, Section III.B.4.e, last sentence - Describe the remedial action (i.e. concrete caps).

ok 25. Page 37, Section III.B.4.h., last sentence - Describe how and if the ROD goals were met.

discuss w/ Jamie - do you still want to discuss this? ☐
no info on
specific removal process.

26. Page 41, 1st para - Describe the tank removals.

27. Page 42, 1st para - Describe the remedial action.

ok 28. Page 49, 1st para, last sentence - The Horseshoe Landfill was remediated and revegetated. Refer to the construction close-out report for ALE.

ok 29. Page 52, 1st para, last sentence - The landfill was remediated and revegetated.

Refer to the construction close-out report for ALE.

30. Page 53 - Magnesium, iron, PH's and TPH are not CERCLA hazardous substances. Why is no data shown for 1100-IU-1?

31. Page 56, Section D - Siemens is a PRP for TCE.

Section IV

32. Page 56, Section IV, 1st sentence - This sentence appears to be missing some words. Rewrite.

Section V

33. Page 59, Section V.B. 3rd sentence - There is no evidence of a chromium plume in the groundwater. Therefore, there is little or no potential for chromium to migrate to the river via groundwater.

34. Page 62, Section V.B.4 - Explain the purpose of the PAS for ALE.

35. Page 63, Section V.C.1. - The reference to Tables 3 and 4 in this sentence should say Tables 2 and 3 respectively. Also, this sentence says that "analytes exceeding maximum contaminant levels" are in table 4 (should be table 3), but the caption for the table just says "maximum concentrations in groundwater." All references to Table 4 need to be compatible.

36. Page 63, Section V.C.4 - Put the soil data in a table similar to Table 2.

37. Page 65, 2nd complete para, 2nd line - Reword to read "RI's or the LFI/FFS."

38. Page 68, Section V.D.1.d, 2nd para, 5th sentence - This sentence says there are two permanent springs on ALE. There are actually at least 5 permanent springs on ALE. The three not mentioned include the Bobcat canyon spring, Bennet Springs near the top of the ridge and at the western boundary, and one small spring in upper Snively basin. Reword the sentence to read "The three largest springs are Rattlesnake Springs, Snively Springs, and Bobcat Canyon Springs." In the seventh sentence of this paragraph change "...are narrow corridors by provide..." to read "...are narrow corridors that provide..."

39. Page 69, 3rd line on the page - Please contact RL for information on cultural resources.

40. Page 69, Section V.D.2 - TCE has been detected in groundwater above the MCL and therefore has "injured" the groundwater. Please contact RL in regards to this issue. Additional groundwater data is available and will be provided to USFWS.

41. Page 70, 1st line - Tables 5 and 6 should be Tables 6-9.

42. Page 70, 2nd para, 2nd sentence - See comment 33. concerning chromium.

43. Figure 2 - Better figures showing the OUs and sites should be used.